

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA
PLAINTIFF,**

CASE #: 11-20468

VS.

HON. ARTHUR J. TARNOW

**VINOD PATEL, D-36
DEFENDANT.**

AUSA Wayne F. Pratt
AUSA John K. Neal
U.S. Attorney's Office
211 W. Fort Street, Suite 2001
Detroit, MI 48226
(313) 226-2548

Harold Gurewitz
Counsel for Defendant Vinod Patel
Gurewitz & Raben, PLC
333 W. Fort Street, Suite 1100
Detroit, MI 48226
(313) 628-4733

**MOTION TO REQUEST NOTICE OF GOVERNMENT'S
INTENT TO CALL EXPERT WITNESSES**

Now comes Defendant Vinod Patel by his attorney, Harold Gurewitz, and respectfully requests that this Court order the Government to provide notice of its intent to call expert witnesses in this case pursuant to Federal Rules of Evidence 702, 703 and 705 and FRCrP Rule 16(a)(1)(G).

Pursuant to LCR 7.1, counsel for Defendant has contacted AUSA John Neal seeking compliance with these rules but, to the present, no disclosures required by those rules have been made.

For his reasons, Defendant relies upon the brief attached to this motion.

Respectfully Submitted,

GUREWITZ & RABEN, PLC

By: s/Harold Gurewitz
333 W. Fort Street, 11th floor
Detroit, MI 48226
(313) 628-4733
Email: hgurewitz@grplc.com
Attorney Bar Number: 14468

Date: November 1, 2013

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**BRIEF IN SUPPORT OF MOTION TO REQUEST NOTICE OF
GOVERNMENT'S INTENT TO CALL EXPERT WITNESSES**

Defendant Vinod Patel requests that this Court order the Government to provide notice of its intent to call expert witnesses in this case and a summary of any testimony as required by FRCP Rule 16(a)(1)(G) and FRE Rules 702, 703 and 705.

It is essential to Mr. Patel's defense that the Government provide notice of its intent to call expert witnesses and specify how such witnesses would qualify as experts under the rules. The allegations in the case concern professional practices, operation of health insurance programs, and home health care agencies. The Government should be required to advise the Defendant, sufficiently in advance of trial, whether expert testimony relating to the dispensing and filling of prescriptions, and operations of home health care agencies, among other issues, will be addressed by expert testimony so that Defendant Patel can have the opportunity to adequately prepare.

Therefore, Defendant Vinod Patel requests that this Court order the Government to provide notice of its intent to call expert witnesses in this case.

Respectfully Submitted,

GUREWITZ & RABEN, PLC

By: s/Harold Gurewitz
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Attorney Bar Number: 14468

Date: November 1, 2013

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all parties of record.

/s Harold Gurewitz (P14468)
Gurewitz & Raben, PLC
333 W. Fort Street, Suite 1100
Detroit, MI 48226
(313) 628-4733
email: hgurewitz@grplc.com